

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)

Plaintiff,)

v.)

BOLIVARIAN REPUBLIC OF VENEZUELA,)

Defendant.)

**CONFIDENTIAL – FILED
UNDER SEAL**

Case No. 1:17-mc-00151-LPS

**DECLARATION OF JOHN ZUKLIC IN SUPPORT OF VENEZUELA PARTIES’
MOTION TO MAINTAIN THE SPECIAL MASTER’S PROPOSED SALES
PROCEDURES ORDER AND EXPLANATORY REPORT UNDER SEAL**

I, John Zuklic, declare as follows:

1. I am the Vice President and Chief Financial Officer of Intervenor CITGO Petroleum Corporation (“CITGO”). I make this declaration in support of the Venezuela Parties’ Motion to Maintain the Special Master’s Proposed Sales Procedures Order and Explanatory Report Under Seal.

2. I make this declaration based on my personal knowledge and information learned from other officers and employees of CITGO in my role as Vice President and Chief Financial Officer. If called as a witness, I could and would competently testify to the information herein.

3. I understand that Special Master Robert B. Pincus filed a Proposed Sales Procedures Order (“PSPO”) and an accompanying Explanatory Report in the above-captioned matter on August 9, 2021. I am generally familiar with those documents [REDACTED]

[REDACTED]

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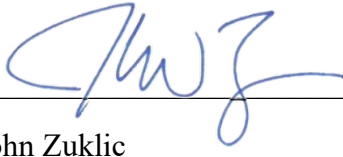
[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2021, at Houston, Texas.



John Zuklic